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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20054

In the matter of

Guidelines for Evaluating the
Environmental Effects of
Radiofrequency Radiation

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ET Docket No. 93-62

MOTION FOR EXTENSION OF TIME

CBS Inc. ("CBS"), through its attorneys, hereby respectfully requests that the time for filing comments and reply comments in response to the above-captioned *Notice of Proposed Rule Making* ("Notice") be extended for a period of 14 days. Comments are currently due on January 11, 1994, and reply comments are due February 10, 1994. The additional time is needed by CBS so that it may more fully analyze preliminary field measurements it has made as a first step to assessing the impact of the proposed induced current standard. CBS also needs the additional time to coordinate its views with other parties toward the goal of filing joint comments with a number of other major station group owners.

During the pendency of this difficult and complicated proceeding, CBS and other broadcast interests have received additional time from the Commission to analyze the full impact of the FCC's proposals on the broadcast industry. Most recently, CBS and Capital Cities/ABC Inc. ("Capital Cities") received a two month extension in part

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to perform field measurements that would be used to evaluate whether certain laboratory findings on induced currents produced by RF fields correspond with real-world data. It was anticipated by CBS and Capital Cities that two months would be an adequate amount of time to compile a sufficient sampling of measurements necessary to permit competent analysis. This has proven not to be the case, in large part because of delays experienced by CBS in acquiring the equipment necessary to measure induced currents -- equipment which is only now becoming available. While CBS has nonetheless been able to compile certain preliminary data which it believes will be useful to the Commission in considering implementation of the induced current standard, in view of the above noted delays and the unusual complexity of the issues in this docket, a brief additional period is needed for CBS to complete the analysis and organization of this data.

CBS also seeks the additional time in order to facilitate the coordination of possible joint comments with other broadcast entities. During the present extension period, several major group owners have held meetings and discussions to determine whether consensus may be reached on the major issues in this proceeding. These discussions have achieved significant progress and CBS is hopeful that the additional time requested will make possible the filing of a single set of comments representing the views of these broadcasters. Through such a joint filing, the Commission would have the benefit of the consolidated views of several major broadcast organizations, thus conserving staff resources.

CBS understands the reluctance of the Commission repeatedly to extend its deadlines. Given the unique complexity of this proceeding, however, CBS believes that the public interest will be served by granting the brief additional time requested, which we believe will allow a more meaningful presentation of the views of broadcasters. In this connection, we note that CBS has devoted significant resources in terms of time, money and personnel to the analysis of issues presented in this proceeding.

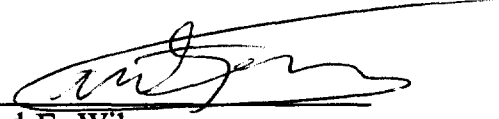
As the Commission has noted, the proposed RF standard poses significant issues and potential burdens for broadcast stations. CBS believes that it is incumbent upon the FCC and the broadcast industry to ensure that these burdens are minimized to the greatest extent possible without placing any persons at risk of excessive exposure to RF radiation. In order to achieve this goal, it is essential that sufficient time be available for analysis of the very complex issues involved.

Finally, we note that CBS will not seek any additional time to file comments in this proceeding should this request be granted.

For these reasons, CBS seeks respectfully asks the FCC to extend the deadline for filing comments and reply comments to the *Notice* in ET Docket No. 93-62 for an additional 14 days.

Respectfully Submitted,

CBS, Inc.

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